

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**UNITED STATES OF AMERICA,** )  
  )  
  )  
**v.**                                 )  
  )  
**GLEN CASADA and**              )      Case No. 3:22-CR-00282  
**CADE COTHREN,**                 )      Judge Eli J. Richardson  
  )  
**Defendants.**                    )

**DEFENDANT CADE COTHREN'S MOTION TO EXTEND DEADLINES FOR  
PRETRIAL MOTIONS AND TO DISCLOSE EXPERT WITNESSES**

Comes now Defendant Cade Cothren, by and through undersigned counsel, and hereby moves this Honorable Court for an Order extending the deadlines for Mr. Cothren to file pretrial motions and to disclose expert witnesses until August 24, 2023. In support, Mr. Cothren would show:

1.       The deadline for Mr. Cothren to file pretrial motions is July 25, 2023 (Doc. No. 49).
2.       The deadline for the parties to disclose expert witnesses is July 31, 2023 (Doc. No. 49).
3.       The government produced additional discovery on July 20, 2023.
4.       In addition to the government's most recent production, the government represented on July 24, 2023 that Mr. Cothren should expect "additional rolling production as [they] receive additional records from the FBI."
5.       Mr. Cothren requires time to review and analyze the supplemental discovery productions and determine if any pretrial motions and/or expert witnesses are necessary.

6. Undersigned counsel has conferred with Trial Attorney for the United States Department of Justice John Taddei who states that the government does not oppose Mr. Cothren's Motion to extend the above-referenced deadlines until August 24, 2023.

7. Mr. Cothren does not waive any right to seek further relief from the Court necessitated from the government's recent as well as expected "rolling" discovery production.

For all the above reasons, Mr. Cothren respectfully requests this Court enter an Order extending the deadlines for Mr. Cothren to file pretrial motions and to disclose expert witnesses until August 24, 2023.

Respectfully Submitted,

**Sherwood Boutique Litigation, PLC**

/s/ Cynthia A. Sherwood

Cynthia A. Sherwood, #20911

Austin M. Correll, #39561

414 Union Street

Suite 1110

Nashville, TN 37219

T: 615-873-5670

F: 615-900-2312

cynthia@sherwoodlitigation.com

austin@sherwoodlitigation.com

*Counsel for Defendant Cade Cothren*

**Barnes & Thornburg LLP**

/s/ Joy Boyd Longnecker

Joy Boyd Longnecker, #29627

827 19th Avenue South

Suite 930

Nashville, TN 37203-3447

T: 615-925-9506

Joy.Longnecker@btlaw.com

*Counsel for Defendant Cade Cothren*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing has been served on the following via the Court's CM/ECF system to:

Amanda J. Klopf, Esq.  
Assistant United States Attorney  
719 Church Street, Suite 3300  
Nashville, TN 37203  
Amanda.Klopf@usdoj.gov

John P. Taddei, Esq.  
Trial Attorney  
Public Integrity Section, Criminal Division  
U.S. Department of Justice  
1301 New York Ave., NW  
Washington, DC 20530  
john.taddei@usdoj.gov

on this the 24th day of July 2023.

/s/ Cynthia A. Sherwood